

THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,

Plaintiff,

VS.

LYKART TECHNOLOGIES LLC,  
GROWKART, TRANSFORM SR  
BRANDS LLC, KMART, KMART.COM,  
SEARS, SEARS.COM, ALPHABET  
INC., GOOGLE LLC, YOUTUBE.COM,  
POSHMARK INC., STL PRO, INC.,  
TARGET CORPORATION,  
TARGET.COM, TOTALHILL.COM,  
MICROSOFT CORPORATION, INC.,  
APPLE INC. and MOZILLA  
CORPORATION

Defendants.

Case No. 3:22-cv-1754

Judge Joseph F. Saporito, Jr.

Referred to: Phillip J. Caraballo

JURY TRIAL DEMANDED

FILED  
SCRANTON

MAR 27 2025

PER DJ  
DEPUTY CLERK

**SECOND NOTICE OF ERRATA**

Plaintiff, David J. Catanzaro proceeding pro se, hereby submits this **Second Notice of Errata** to correct clerical errors in **Paragraphs 36 and 40** of Plaintiff's Verified **Fifth Amended Complaint for Patent Infringement** ("Fifth Amended Complaint") entered by the Clerk on **March 18, 2025** [ECF 71]. In Paragraph 36 Subparagraphs **(b)** and **(c)** Plaintiff made an error by not including the word "**or.**" In Paragraph 40 Subparagraph **(d)** Plaintiff made an error by not including the word "**flag.**"

**ERROR #1**

**Paragraph 36 Subparagraph (b) currently reads:**

*“The lack of algorithms designed to flag and remove product listings that match the claims of valid patents”*

**CORRECTION:**

*“The lack of algorithms designed to flag and/or remove product listings that match the claims of valid patents”*

**ERROR #2**

**Paragraph 36 Subparagraph (c) currently reads:**

*“The failure to implement proactive monitoring systems that would detect and prevent the sale of infringing products.”*

**CORRECTION:**

*“The failure to implement proactive monitoring systems that would detect and/or prevent the sale of infringing products.”*

**ERROR #3**

**Paragraph 40 Subparagraph (d) currently reads:**

*"Fail to implement adequate measures to prevent or remove listings  
for infringing products, despite having the capability to do so."*

**CORRECTION:**

*"Fail to implement adequate measures to flag, prevent or remove listings  
for infringing products, despite having the capability to do so."*

**REASON FOR CORRECTIONS:**

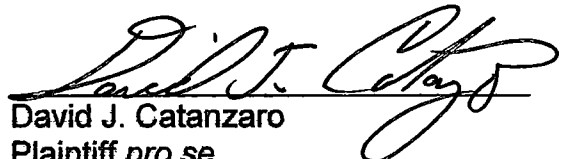
These corrections are necessary to ensure that the Fifth Amended Complaint accurately reflects the full scope of the allegations asserted—particularly regarding **Willful Blindness and Inducement of Infringement**. The omitted words were clerical in nature and do not substantively alter the legal claims already presented. These corrections merely clarify language previously intended and do not introduce new factual allegations, legal claims, or defendants.

**CONCLUSION:**

WHEREFORE, Plaintiff respectfully requests that the Court accept this **Second Notice of Errata** and consider these corrections as part of the official record in support of the Fifth Amended Complaint.

Date March 27, 2025

Respectfully submitted,



David J. Catanzaro  
Plaintiff *pro se*  
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**CERTIFICATE OF SERVICE**

I, David J. Catanzaro, hereby certify that on March 27, 2025, a true and correct copy of Plaintiff's SECOND NOTICE OF ERRATA was served as follows:

**For Represented Defendants:**

Pursuant to Fed. R. Civ. P. 5(b)(2)(C), service was made by **U.S. Mail** to **one counsel of record** for each represented defendant at their official firm mailing address. As a courtesy, copies were also sent via **email** to all additional known counsel of record for the respective parties.

**Served by First Class U.S. Mail:**

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**For Unrepresented Defendants:**

The following two defendants have not appeared in this case and are not represented by counsel. Copies of the foregoing document were served by First Class **U.S. Mail** to the last known business address shared by both entities:

**Lykart Technologies, LLC, and GrowKart**

30 N Gould St Suite 5707  
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These defendants are presently in **default**, and Plaintiff reserves the right to move for entry of default as appropriate.

Date March 27, 2025



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